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Received from CDH
9/18/91

ROY ROMER
Governor

JOEL KOHN
Interim Executive Director

5 September 1991

Mr. David Simonson
U.S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, CO 80402-0928

Mr. James O. Zane
EG&G - Rocky Flats
P.O. Box 928
Golden, CO 80402-0928

RE: State Review, Ground Water Assessment Plan Addendum, 1989 and 1990 Annual Ground Water Monitoring Reports for Rocky Flats Plant

Dear Messrs. Simonson and Zane,

The Hazardous Materials and Waste Management Division has reviewed the 1990 Ground Water Assessment Plan Addendum and the 1989 and 1990 Annual Ground Water Monitoring Reports for Regulated Units at the Rocky Flats Plant. Comments on each of these documents are enclosed.

Although these documents show improvement over past submittals, there is still little or no emphasis on evaluating data relationships over more than a single year. 6 CCR 1007-3, Part 265.93(d)(3), requires the owner or operator of a hazardous waste management unit to determine the rate and extent of migration of hazardous waste or hazardous waste constituents in the ground water. This has not been adequately performed on the RCRA units at the facility. A year-to-year comparison of the data generated for each RCRA-regulated unit should be included in these reports to fully characterize the rate and extent of the contaminant plumes in the area.

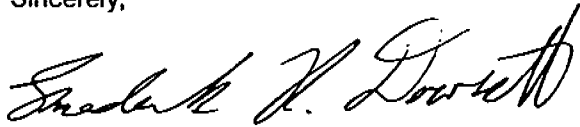
The Solar Evaporation Ponds have shown a statistically significant increase in contamination through the two years covered in the 1989 and 1990 reports. Since the contaminant plume has not been adequately defined in this area, priority should be given to characterizing it, and, if necessary, designing and implementing actions to prevent the spread of the contaminants already found.

ADMIN RECORD

Page Two
U.S. DOE-Rocky Flats and EG&G-Rocky Flats
RE: Ground Water Submittal Reviews

If you have further questions in this matter, please contact Caren Johannes of my staff at 331-4874.

Sincerely,

A handwritten signature in black ink, appearing to read "Frederick R. Dowsett". The signature is fluid and cursive, with the first name "Frederick" and last name "Dowsett" clearly distinguishable.

Frederick R. Dowsett, Unit Leader
Monitoring and Enforcement
Hazardous Materials and Waste Management Division

cc: Jim Langman, EG&G
Brent Lewis, DOE-RFO
Martin Hestmark, EPA

FRD:CJ/s
rfgwtrns.let